

1 WRIGHT, FINLAY & ZAK, LLP
2 Ramir M. Hernandez, Esq.
3 Nevada Bar No. 13146
4 7785 W. Sahara Ave., Suite 200
5 Las Vegas, NV 89117
(949) 477-5050; Fax: (702) 946-1345
rhernandez@wrightlegal.net
Attorneys for Conn Appliances, Inc.

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LISA ESPITIA,

9 Plaintiff,

10 vs.

11 EXPERIAN INFORMATION SOLUTIONS,
12 INC.; CONN APPLIANCES, INC. and
13 SYNCHRONY BANK,

14 Defendants.

Case No.: 2:23-cv-00028-RFB-VCF

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (THIRD
REQUEST)**

15 Plaintiff, Lisa Espitia ("Plaintiff"), and Defendant, Conn Appliances, Inc. ("Defendant")
16 (collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as
17 follows:

18 On January 5, 2023, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with
19 Plaintiff's Complaint on January 9, 2023. The deadline for Defendant to respond to Plaintiff's
20 Complaint is March 22, 2023. The Parties have discussed extending the deadline for Defendant to
21 respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss
22 possible resolution of the matter.

23 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to
24 file its responsive pleading to Plaintiff's Complaint to April 6, 2023.

25 This is the third motion for an extension of time for Defendant to file its responsive
26 pleading. The extension is requested in good faith is not for purposes of delay or prejudice to any
27 other party. This is the last extension the parties anticipate requesting.

28 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that

occurs during the pendency of this extension.

DATED this 17th day of March, 2023.

WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

/s/ Ramir M. Hernandez

/s/ Gerardo Avalos

Ramir M. Hernandez, Esq.

Gerardo Avalos, Esq.

Nevada Bar No. 13146

Nevada Bar No. 15171

7785 W. Sahara Ave., Suite 200

8985 S. Eastern Ave. Suite 350

Las Vegas, NV 89117

Las Vegas, NV 89123

*Attorneys for Defendant, Conn Appliances,
Inc.*

Attorneys for Plaintiff, Lisa Espitia

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 3-17-2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (THIRD REQUEST)** on the 17th day of March, 2023, to all parties on the CM/ECF service list.

/s/ Erica Baker

An Employee of WRIGHT, FINLAY & ZAK, LLP